

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

WILLIAM TRICE,
RICO CRAWFORD,
ADDONIS MOORE,
JOVONNE HAYNES,
GIOVANNI GEORGE,
ADRIANNA BEAN,
DERRICK HAMLET,
DAYSHAWN BURTON,
LEWIS JOHNSON,
LLOYD VAUGHN, and
KENNETH JONES,

Defendants.

FILED

FEB 15 2022

U.S. DISTRICT COURT
ELKINS WV 26241

Criminal No. 1:22cr11 TSK/MJA

Violations: 18 U.S.C. § 2
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Distribute Controlled Substances)

From in or about October of 2020, to on or about the return of this Indictment, in Monongalia County, in the Northern District of West Virginia, and elsewhere, defendants, **WILLIAM TRICE, RICO CRAWFORD, ADDONIS MOORE, JOVONNE HAYNES, GIOVANNI GEORGE, ADRIANNA BEAN, DERRICK HAMLET, DAYSHAWN BURTON, LEWIS JOHNSON, LLOYD VAUGHN, and KENNETH JONES**, and others did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and

object of the conspiracy to possess with intent to distribute, and to distribute methamphetamine, cocaine base, also known as “crack,” cocaine hydrochloride, also known as “coke”, and fentanyl, all Schedule II narcotic controlled substances, and heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWO

(Distribution of Cocaine Base)

On or about October 7, 2020, in Monongalia County, in the Northern District of West Virginia, defendant, **WILLIAM TRICE** did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack”, a Schedule II narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

(Distribution of Fentanyl)

On or about January 22, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **WILLIAM TRICE** did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

(Aiding and Abetting Distribution of Fentanyl)

On or about January 26, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **WILLIAM TRICE** aided and abetted by defendant **DERRICK HAMLET**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$60.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIVE

(Distribution of Fentanyl)

On or about February 10, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **WILLIAM TRICE** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$120.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Aiding and Abetting Distribution of Heroin)

On or about February 23, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **RICO CRAWFORD** aided and abetted by defendant **ADDONIS MOORE**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$140.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

(Aiding and Abetting Distribution of Heroin)

On or about February 23, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **DERRICK HAMLET**, aided and abetted by defendant **WILLIAM TRICE** did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$120.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHT

(Aiding and Abetting Distribution of Fentanyl)

On or about March 4, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **ADDONIS MOORE** aided and abetted by another person did unlawfully, knowingly, intentionally and without authority distribute, a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$160.00 in United States Currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINE

(Aiding and Abetting Distribution of Heroin and Fentanyl)

On or about March 15, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **LLOYD VAUGHN** aided and abetting by defendant **ADDONIS MOORE** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, and fentanyl, a Schedule II narcotic controlled substance, in exchange for \$160.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TEN

(Possession with Intent to Distribute Methamphetamine)

On or about April 7, 2021, in Monongalia County, in the Northern District of West Virginia, defendants **RICO CRAWFORD** and **ADDONIS MOORE** did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT ELEVEN

(Possession with Intent to Distribute Fentanyl)

On or about April 7, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **RICO CRAWFORD** and **ADDONIS MOORE** did unlawfully, knowingly, intentionally and without authority possession with intent to distribute, a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

(Aiding and Abetting Possession with Intent to Distribute Heroin)

On or about April 7, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **RICO CRAWFORD** and **ADDONIS MOORE** did unlawfully, knowingly, intentionally and without authority possession with intent to distribute, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

(Aiding and Abetting Distribution of Heroin and Fentanyl)

On or about April 9, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **LEWIS JOHNSON**, aided and abetted by defendant **ADDONIS MOORE** did unlawfully, knowingly, intentionally and without authority distribute, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, and fentanyl, a Schedule II narcotic controlled substance, in exchange for \$160.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

(Aiding and Abetting Distribution of Methamphetamine)

On or about April 13, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **LEWIS JOHNSON**, aided and abetted by defendant **ADDONIS MOORE** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for \$500.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

(Aiding and Abetting Distribution of Methamphetamine)

On or about April 19, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **LLOYD VAUGHN**, aided and abetted by defendant **ADDONIS MOORE** did unlawfully, knowingly, intentionally and without authority distribute of methamphetamine, a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

(Aiding and Abetting Distribution of Heroin and Fentanyl)

On or about April 28, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **KENNETH JONES**, aided and abetted by defendant **ADDONIS MOORE**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, and fentanyl, a Schedule II narcotic controlled substance, in exchange for \$160.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

(Distribution of Methamphetamine)

On or about May 3, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **KENNETH JONES**, aided and abetted by defendant **ADDONIS MOORE**, did unlawfully, knowingly, intentionally and without authority distribute of methamphetamine, a Schedule II narcotic controlled substance, in exchange for \$500.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

(Possession with Intent to Distribute Fentanyl)

On or about May 10, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **KENNETH JONES** did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINETEEN

(Possession with Intent to Distribute Methamphetamine)

On or about May 10, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **KENNETH JONES** did unlawfully, knowingly, intentionally and without authority possess with intent to distribute methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWENTY

(Possession with Intent to Distribute Methamphetamine)

On or about May 10, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **LLOYD VAUGHN** did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Possession with Intent to Distribute Fentanyl and Heroin)

On or about May 10, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **LLOYD VAUGHN** did unlawfully, knowingly, intentionally and without authority possession with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-TWO

(Possession with Intent to Distribute Fentanyl)

On or about May 13, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **LEWIS JOHNSON** did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-THREE

(Distribution of Fentanyl)

On or about May 21, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **GIOVANNI GEORGE** did unlawfully, knowingly, intentionally and without authority distribute fentanyl, a Schedule II narcotic controlled substance, in exchange for a sum of United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FOUR

(Distribution of Methamphetamine)

On or about May 21, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **GIOVANNI GEORGE** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for a sum of United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FIVE

(Distribution of Fentanyl)

On or about June 10, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **GIOVANNI GEORGE** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for a sum of United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-SIX

(Distribution of Methamphetamine)

On or about June 10, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **GIOVANNI GEORGE** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for a sum of United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-SEVEN

(Aiding and Abetting Distribution of Methamphetamine)

On or about June 23, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **DAYSHAWN BURTON**, aided and abetted by defendant **JOVONNE HAYNES**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in exchange for \$450.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT

(Possession with Intent to Distribute Cocaine Hydrochloride)

On or about July 5, 2021, in Monongalia County, in the Northern District of West Virginia, defendants **GIOVANNI GEORGE and ADRIANNA BEAN**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute cocaine hydrochloride, also known as “coke,” a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(C).

COUNT TWENTY-NINE

(Possession with Intent to Distribute Methamphetamine)

On or about July 5, 2021, in Monongalia County, in the Northern District of West Virginia, defendants **GIOVANNI GEORGE and ADRIANNA BEAN**, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY

(Distribution of Methamphetamine)

On or about July 7, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **JOVONNE HAYNES** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for \$450.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-ONE

(Distribution of Methamphetamine)

On or about July 7, 2021, in Monongalia County, in the Northern District of West Virginia, subsequent to the transaction charged in Count Thirty of this Indictment, defendant **JOVONNE HAYNES** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for \$450.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-TWO

(Distribution of Methamphetamine)

On or about August 1, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **JOVONNE HAYNES** did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for \$425.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-THREE

(Possession with Intent to Distribute Cocaine Base)

On or about August 2, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **JOVONNE HAYNES** did unlawfully, knowingly, intentionally and without authority possess with intent to distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-FOUR

(Possession with Intent to Distribute Fentanyl)

On or about August 2, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **JOVANNE HAYNES** did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-FIVE

(Possession with Intent to Distribute Methamphetamine)

On or about August 2, 2021, in Monongalia County, in the Northern District of West Virginia, defendant **JOVONNE HAYNES** did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Section 846, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, \$2,624.00 in United States Currency, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense.

A true bill,

/s/

Grand Jury Foreperson

/s/

WILLIAM IHLENFELD
United States Attorney

Zelda E. Wesley
Assistant United States Attorney